

G. MARK ALBRIGHT, ESQ. (NV Bar No. 001394)
 DANIEL R. ORMSBY, ESQ. (NV Bar No. 014595)
 KYLE W. FENTON, ESQ. (NV Bar No. 016235)
ALBRIGHT, STODDARD, WARNICK & ALBRIGHT
 801 South Rancho Drive, Suite D-4
 Las Vegas, Nevada 89106
 Tel: 702-384-7111
 Fax: 702-384-0605
gma@albrightstoddard.com
dormsby@albrightstoddard.com
kfenton@albrightstoddard.com
Attorneys for Defendant/Counterclaimant,
Jennifer Griffin Hill

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE WOUNDED BLUE, a Nevada nonprofit
 corporation,

Plaintiff,

vs.

JENNIFER GRIFFIN HILL, an individual,

Defendant.

JENNIFER GRIFFIN HILL, an individual,

Counterclaimant,

vs.

THE WOUNDED BLUE, a Nevada nonprofit
 corporation; and RANDY SUTTON, an
 individual,

Counter-Defendants.

CASE NO.: 2:24-CV-01592-CDS-MDC

**STIPULATION AND [PROPOSED]
 ORDER TO CORRECT DESIGNATION
 OF PARTIES AND FOR AN EXTENSION
 OF TIME FOR THE PARTIES TO
 EXCHANGE INITIAL DISCLOSURES
 [FIRST REQUEST]**

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COME NOW, Defendant/Counterclaimant JENNIFER GRIFFIN HILL, an individual (hereinafter “Hill” or “Defendant”), by and through her counsel, G. Mark Albright, Esq. of ALBRIGHT STODDARD WARNICK & ALBRIGHT, and Plaintiff, THE WOUNDED BLUE, a Nevada nonprofit corporation (hereinafter “TWB” or “Plaintiff”), by and through its counsel, Anthony J. DiRaimondo, Esq. of RICE REUTHER SULLIVAN & CARROLL, LLP, and Counter-Defendants, TWB and RANDY SUTTON, an individual (hereinafter, “Sutton”) (TWB and Sutton are collectively, “Counter-Defendants”), by and through their counsel, Lauren B. Grassotti of JACKSON LEWIS P.C., admitted to practice in this Case, *pro hac vice*, and hereby stipulate and agree, subject to the Court’s approval, to correct the designation of all Parties to this Action to the Court’s Docket, and for an extension of time for the Parties to exchange their Initial Disclosures pursuant to *Federal Rule of Civil Procedure* 26(a) (the previous deadline having been March 20, 2025). This Stipulation and Proposed Order is the First Request with respect to these issues and is submitted pursuant to LR IA 6-1 and LR IA 6-2, as follows:

WHEREAS TWB filed its Complaint against Hill on August 28, 2024 [ECF No. 1].

WHEREAS Hill filed her Answer to TWB’s Complaint, a Counterclaim against TWB, and a Third-Party Complaint against Sutton on December 30, 2024 [ECF No. 16].

WHEREAS Hill filed an Amended Answer to Complaint and Counterclaim vacating the Third-Party Complaint, and to include Sutton as a Counter-Defendant to Hill’s Counterclaim on January 3, 2025 [ECF No. 18].

WHEREAS on January 21, 2025, a Stipulation and Order was entered by this Court granting an extension of time for Counter-Defendants to answer Hill’s Amended Counterclaim until March 11, 2025 [ECF No. 25].

WHEREAS on February 12, 2025, a Stipulation and Order was entered by this Court granting an extension of time for the Parties to file a proposed discovery plan and scheduling order until February 26, 2025 [ECF No. 27].

WHEREAS on February 24, 2025, a Stipulation and Order was entered by this Court granting a second extension of time for the Parties to file their proposed discovery plan and scheduling order until March 7, 2025 [ECF No. 29].

1 **WHEREAS** on March 10, 2025, a Stipulation and Order was entered by this Court
2 granting a second extension of time for Counter-Defendants to answer Hill's Amended
3 Counterclaim until March 25, 2025 [ECF No. 33].

4 **WHEREAS** on March 12, 2025, a Scheduling Order was entered by this Court granting
5 the Parties' Discovery Plan and Scheduling Order [ECF No. 35].

6 **WHEREAS** pursuant to the Discovery Plan, the deadline for exchanging Initial
7 Disclosures pursuant to Fed. R. Civ. P. 26(a) was March 20, 2025, however, the Parties agreed to
8 exchange their Initial Disclosures after TWB and Sutton filed their answer to Hill's Amended
9 Counterclaim, specifically, by March 31, 2025.

10 **WHEREAS** on March 25, 2025, the Parties filed a Stipulation and [Proposed] Order
11 requesting in the third instance that this Court grant an extension of time for Counter-Defendants
12 to answer Hill's Amended Counterclaim, until April 8, 2025 [ECF No. 37], and this Court granted
13 said request and an Order thereon was entered on March 31, 2025.

14 **WHEREAS** TWB and Sutton filed an Answer to Hill's Counterclaim on April 8, 2025.

15 **WHEREAS** an extension of time for the Parties to exchange Initial Disclosures is
16 reasonable due to counsel for the Parties in this Case having engaged in discussions for potential
17 settlement of the claims to the Complaint and Amended Counterclaim, which discussions occurred
18 via virtual meeting as recently as April 29, 2025, and they expect to continue those discussions.
19 Further, the Parties required additional time to correct the caption of pleadings before making
20 initial disclosures. Additionally, during this timeframe, TWB and Sutton retained new counsel to
21 defend against the Counterclaim. The foregoing establishes that the Parties are not making their
22 Initial Disclosures as originally scheduled and not moving for an extension before the original
23 deadline is the result of excusable neglect.

24 **IT IS HEREBY STIPULATED AND AGREED** that this Court enter an order granting
25 the Parties an extension of fourteen (14) days from the date of this Stipulation, for the Parties to
26 submit their Initial Disclosures pursuant to Rule 26(a), and until May 14, 2025.

1 **IT IS HEREBY FURTHER STIPULATED AND AGREED** that due to Hill having
2 vacated her Third-Party Complaint against Sutton, and rather, having included Sutton as a Counter-
3 Defendant to her Amended Counterclaim, that this Court enter an order that the Court Docket and
4 Case Caption subject to the above-referenced Action, be corrected to properly designate each of
5 the Parties hereto, as follows:

6 THE WOUNDED BLUE: Plaintiff/Counter-Defendant;

7 JENNIFER GRIFFIN HILL: Defendant/Counterclaimant;

8 RANDY SUTTON: Counter-Defendant; and

9 The Third-Party Plaintiff and Third-Party Defendant be stricken from the Docket.

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Good cause exists for this Court to enter an order granting this Stipulation, which is hereby submitted in good faith, is not interposed to cause delay, and is not submitted for any improper purpose.

Dated this 30th day of April, 2025.

Dated this 30th day of April, 2025.

**ALBRIGHT, STODDARD,
WARNICK & ALBRIGHT**

**RICE REUTHER SULLIVAN &
CARROLL, LLP**

/s/ G. Mark Albright, Esq.

G. Mark Albright, Esq. (#1394)

801 S Rancho Dr, Ste D-4

Las Vegas, NV 89106

T: 702-384-7111 / F: 702-384-0605

gma@albrightstoddard.com

Attorneys for Defendant/Counterclaimant

Jennifer Griffin Hill

/s// Anthony J. DiRaimondo, Esq.

Anthony J. DiRaimondo, Esq. (#10875)

3800 Howard Hughes Pkwy, Ste 1200

Las Vegas, NV 89169

T: 702-732-9099 / F: 702-732-7110

adiraimondo@rrsc-law.com

Attorneys for Plaintiff The Wounded Blue

Dated this 30th day of April, 2025.

JACKSON LEWIS P.C.

/s// Lauren B. Grassotti, Esq.

Lauren B. Grassotti, Esq.

(Admitted *pro hac vice*)

58 S Service Rd, Ste 250

Melville, NY 11747

T: 631-247-0404

Lauren.grassotti@jacksonlewis.com

Attorneys for Counter-Defendants

The Wounded Blue and Randy Sutton

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ORDER

IT IS SO ORDERED.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Date: 5/2/2025